

# Aviva's Communication on Progress to the UNGC-2019

I am pleased to confirm that Aviva continues to support the Ten Principles of the United Nations Global Compact, specifically concerning the areas of human rights, labour, environment and anti-corruption.

-Amanda Blanc, CEO.

## Company profile and context of operations:

### [Aviva plc Strategic Report 2019](#)

## Implementing the Ten Principles into Strategies & Operations

Please follow the links listed under each criterion to access further information available on [aviva.com](#)

### **Criterion 1: The COP describes mainstreaming into corporate functions and business units**

- Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives.

[Good Governance](#)<sup>1</sup>

[Social Purpose- Bright Ideas](#)<sup>2</sup>

- Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary

[Good Governance](#)<sup>3</sup>

[Policies and Responses](#)<sup>4</sup>

### **Criterion 2: The COP describes value chain implementation**

- Communicate policies and expectations to suppliers and other relevant business partners

[Policies and Responses](#)<sup>5</sup>

See specifically:

- [The Aviva Business Ethics Code](#)<sup>6</sup>
- [Aviva's Third-Party Business Code of Behaviour](#)<sup>7</sup>
- [The Procurement and Outsourcing Business Standard](#)<sup>8</sup>

- Undertake awareness-raising, training and other types of capacity building with suppliers, investors and other business partners

<sup>1</sup> <https://www.aviva.com/social-purpose/good-governance/>

<sup>2</sup> <https://www.aviva.com/social-purpose/bright-ideas/>

<sup>3</sup> <https://www.aviva.com/social-purpose/good-governance/>

<sup>4</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>5</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>6</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>7</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/aviva-third-party-business-code-of-behaviour.pdf>

<sup>8</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/Procurement and outsourcing business standard 2020.pdf>

[Responsible Investment](#)<sup>9</sup>

[Sustainable Finance](#)<sup>10</sup>

[Good Governance](#)<sup>11</sup>

[Aviva Modern Slavery Act Transparency Statement 2019](#)<sup>12</sup>

## Robust Human Rights Management Policies & Procedures

### Criterion 3: The COP describes robust *commitments, strategies or policies* in the area of human rights

- Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights)  
[Aviva plc Strategic Report 2019](#)<sup>13</sup> (Page 22)

[Human Rights Policy](#)<sup>14</sup>

- Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company  
[Human Rights Policy](#)<sup>15</sup>
- Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services  
[Policies and Responses](#)<sup>16</sup>  
See specifically:
  - [Human Rights Policy](#)<sup>17</sup>
  - [CR Climate Change and Environment Business Standard](#)<sup>18</sup>
  - [Cluster Munitions Policy](#)<sup>19</sup>
  - [People Business Standard](#)<sup>20</sup>
- Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties

---

<sup>9</sup> <https://www.aviva.com/social-purpose/responsible-investment/>

<sup>10</sup> <https://www.aviva.com/social-purpose/sustainable-finance/>

<sup>11</sup> <http://www.aviva.com/corporate-responsibility/our-approach/stakeholder-engagement/>

<sup>12</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>13</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>14</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>15</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>16</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>17</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>18</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr-climate-change-and-environment-business-standard-2020.pdf>

<sup>19</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/04-2015-aviva-policy-on-cluster-munitions.pdf>

<sup>20</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/people-business-standard-2020.pdf>

## [Policies and Responses](#)<sup>21</sup>

See specifically:

- [Human Rights Policy](#)<sup>22</sup>
- [Cluster Munitions Policy](#)<sup>23</sup>
- [CR Climate Change and Environment Business Standard](#)<sup>24</sup>
- [People Business Standard](#)<sup>25</sup>

### **Criterion 4: The COP describes effective *management systems* to integrate the human rights principles**

- Process to ensure that internationally recognized human rights are respected

#### [Policies and Responses](#)<sup>26</sup>

See specifically:

- [Human Rights Policy](#)<sup>27</sup>
- [CR Climate Change and Environment Business Standard](#)<sup>28</sup>
- [Corporate Responsibility Update 2019](#)<sup>29</sup>

- Operational-level grievance mechanisms for those potentially impacted by the company's activities

#### [Policies and Responses](#)<sup>30</sup>

See specifically:

- [The Aviva Business Ethics Code](#)<sup>31</sup> (Pages 5-10)
- [Human Rights Policy](#)<sup>32</sup> (Page 6)

As well as Speak Up, our confidential and independent reporting service, employees have free access to The Employee Assistance Programme by Care First. Care First provide a free and confidential service, offering professional, independent and impartial information, support and counselling. This includes online advice and support with issues, in and out of work as well as emotional support by phone 24/7.

As stated in our [Human Rights Policy](#)<sup>33</sup> customers or the public can contact Aviva with queries about our CR Programme (which includes our approach to Human Rights) at [cr.team@aviva.com](mailto:cr.team@aviva.com).

---

<sup>21</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>22</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>23</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/04-2015-aviva-policy-on-cluster-munitions.pdf>

<sup>24</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr\\_climate\\_change\\_and\\_environment\\_business\\_standard\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr_climate_change_and_environment_business_standard_2020.pdf)

<sup>25</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/people\\_business\\_standard\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/people_business_standard_2020.pdf)

<sup>26</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>27</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>28</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr\\_climate\\_change\\_and\\_environment\\_business\\_standard\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr_climate_change_and_environment_business_standard_2020.pdf)

<sup>29</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/corporate-responsibility-update-2019.pdf>

<sup>30</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>31</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>32</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>33</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

- Allocation of responsibilities and accountability for addressing human rights impacts [Customer, Conduct and Reputation Committee](#)<sup>34</sup>

**Criterion 5: The COP describes effective *monitoring and evaluation mechanisms* of human rights integration**

- System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain  
[Aviva plc Strategic Report 2019](#)<sup>35</sup> (Page 21)

[The Aviva Business Ethics Code](#)<sup>36</sup> (Page 7)

[Environmental, Social and Governance Data 2019](#)<sup>37</sup> (Pages 3-4)

## Robust Labour Management Policies & Procedures

Please follow the links listed under each criterion to access further information available on aviva.com

**Criterion 6: The COP describes robust *commitments, strategies or policies* in the area of labour**

- Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies

[Policies and Responses](#)<sup>38</sup>

See specifically:

- [Human Rights Policy](#)<sup>39</sup>
- [Aviva's Third Party Business Code of Behaviour](#)<sup>40</sup>

- Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation  
[Aviva plc Strategic Report 2019](#)<sup>41</sup> (Pages 17-19)

[Time Off, Work & Life Changes Policy](#)<sup>42</sup>

- Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide and engage in dialogue with representative organisation of the workers (international, sectoral, national).

[Policies and Responses](#)<sup>43</sup>

See specifically:

- [Working with Governments](#)<sup>44</sup>

<sup>34</sup> <https://www.aviva.com/about-us/customer-conduct-and-reputation-committee/>

<sup>35</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>36</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>37</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>38</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>39</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

<sup>40</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/aviva-third-party-business-code-of-behaviour.pdf>

<sup>41</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>42</sup> <https://www.avivaworld.com/sites/uk-cs-hr-policies-procedures/SitePages/Time-Off,-Work-and-Life-Changes-Policy.aspx>

<sup>43</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>44</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva\\_working\\_with\\_governments\\_policy\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva_working_with_governments_policy_2020.pdf)

- [The Aviva Business Ethics Code](#)<sup>45</sup>

Inclusion of reference to relevant international labour standards in contracts with suppliers and other relevant business partners [Aviva’s Modern Slavery Act Transparency Statement 2019](#)<sup>46</sup> (Page 7).

- Participation and leadership by employers’ organisations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).  
[Aviva’s Modern Slavery Act Transparency Statement 2019](#)<sup>47</sup> (Pages 11 and 15).

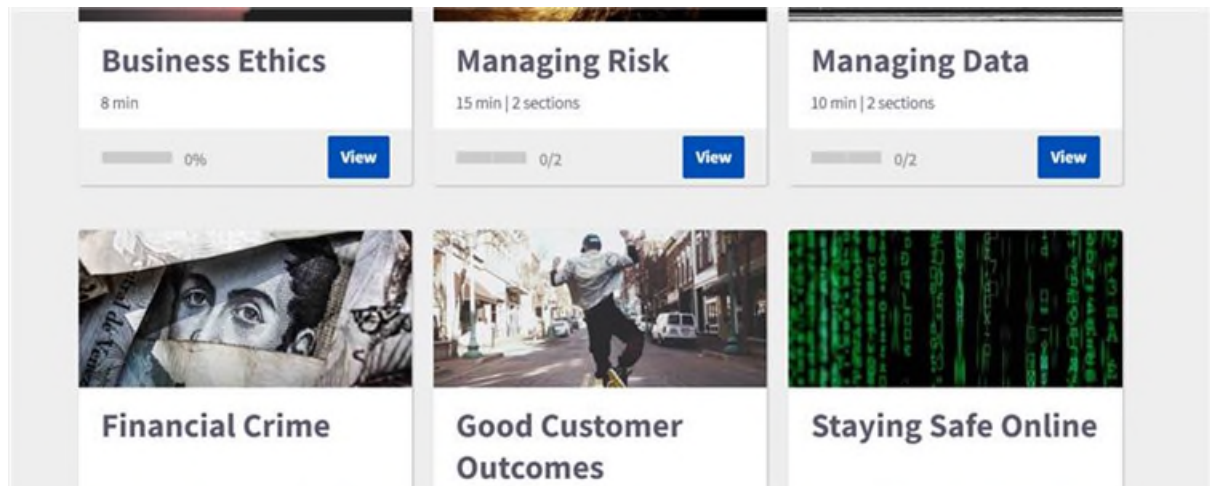
**Criterion 7: The COP describes effective *management systems* to integrate the labour principles**

- Allocation of responsibilities and accountability within the organisation  
[Customer, Conduct and Reputation committee](#)<sup>48</sup>

[Aviva plc Strategic Report 2019](#)<sup>49</sup> (Page 20).

- Internal awareness-raising and training on the labour principles for management and employees  
[Aviva’s Modern Slavery Act Transparency Statement 2019](#)<sup>50</sup> (Pages 18-19).

We also cover labour rights and principles through different channels including essential learning (see screenshots below); articles published on our intranet; events organised by our internal networks (e.g. Women’s network).



<sup>45</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

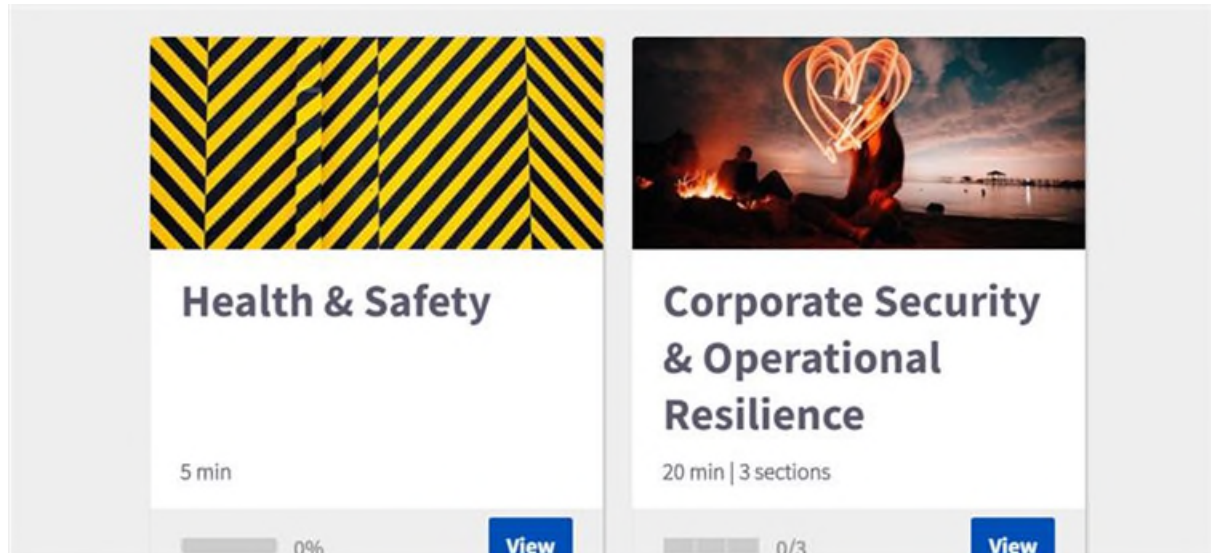
<sup>46</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>47</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>48</sup> <https://www.aviva.com/about-us/governance-committee/>

<sup>49</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>50</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>



- Engagement with suppliers to address labour-related challenges  
[Living Wage Week Parliamentary Reception](#)<sup>51</sup>

[Aviva Extends Living Wage commitment](#)<sup>52</sup>

[Aviva Becomes 'Living Hours' Employer](#)<sup>53</sup>

[Aviva's Modern Slavery Act Transparency Statement 2019](#)<sup>54</sup>

[Policies and Responses](#)<sup>55</sup>

See specifically:

- [The Aviva Business Ethics Code](#)<sup>56</sup> (Pages 5-6)
- [Human Rights Policy](#)<sup>57</sup> (Page 6)

As well as Speak Up, our confidential and independent reporting service, employees have free access to The Employee Assistance Programme by Care First. Care First provide a free and confidential service, offering professional, independent and impartial information, support and counselling. This includes online advice and support with issues, in and out of work as well as emotional support by phone 24/7

Customers or the public can also contact Aviva with queries about our CR Programme (which includes our approach to Human Rights and labour rights) at [cr.team@aviva.com](mailto:cr.team@aviva.com).

<sup>51</sup> <https://www.youtube.com/watch?app=desktop&v=mOZi8WxwRQc>

<sup>52</sup> <https://www.livingwage.org.uk/news/aviva-extends-living-wage-commitment>

<sup>53</sup> <https://www.aviva.com/newsroom/news-releases/2020/10/aviva-becomes-living-hours-employer/>

<sup>54</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>55</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>56</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>57</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

### **Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration**

- System to track and measure performance based on standardized performance metrics [Procurement](#)<sup>58</sup>

[Environmental, Social and Governance Data 2019](#)<sup>59</sup> (Page 9)

- Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards [Aviva's Modern Slavery Act Transparency Statement 2019](#)<sup>60</sup> (Page 13)

### **Robust Environmental Management Policies & Procedures**

Please follow the links listed under each criterion to access further information available on aviva.com

### **Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship**

Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)

[Climate Related Financial Disclosure Report 2019](#)<sup>61</sup>

[Climate Risk and Environmental Impact](#)<sup>62</sup>

[Climate-Related Financial Disclosure](#)<sup>63</sup>

[Aviva Adds Stewardship Funds to Adviser Platform](#)<sup>64</sup>

- Reflection on the relevance of environmental stewardship for the company [Aviva plc Strategic Report 2019](#)<sup>65</sup> (Page 22).

[Aviva Investors Stewardship and Responsible Investment Policy](#)<sup>66</sup> (Page 4).

- Written company policy on environmental stewardship [Climate Risk and Environmental Impact](#)<sup>67</sup>

[Aviva Investors Stewardship and Responsible Investment Policy](#) (Page 4).

- Specific commitments and goals for specified years

---

<sup>58</sup> <http://careers.aviva.co.uk/routes-aviva/experienced/procurement>

<sup>59</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>60</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>61</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/ara-our-climate-related-financial-disclosures.pdf>

<sup>62</sup> <https://www.aviva.com/social-purpose/environment/>

<sup>63</sup> <https://www.aviva.com/social-purpose/climate-related-financial-disclosure/>

<sup>64</sup> <https://www.aviva.com/newsroom/news-releases/2019/11/aviva-adds-stewardship-funds-to-adviser-platform/>

<sup>65</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>66</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/ai-stewardship-statement-2019.pdf>

<sup>67</sup> <https://www.aviva.com/social-purpose/environment/>

[Aviva plc Strategic Report 2019<sup>68</sup>](#) (Page 20).

[Environmental, Social and Governance Data 2019<sup>69</sup>](#)

[Aviva Opens One of the UK's Largest Solar and Energy Storage Initiatives<sup>70</sup>](#)

**Criterion 10: The COP describes effective *management systems* to integrate the environmental principles**

- Environmental risk and impact assessments

[Aviva's Climate-Related Financial Disclosure 2019<sup>71</sup>](#)

[CR Climate Change and Environment Business Standard<sup>72</sup>](#)

- Assessments of lifecycle impact of products, ensuring environmentally sound management policies

[Operations- Environmental Impact<sup>73</sup>](#)

- Allocation of responsibilities and accountability within the organisation

[Aviva's Climate-Related Financial Disclosure 2019<sup>74</sup>](#)

**Criterion 11: The COP describes effective *monitoring and evaluation mechanisms* for environmental stewardship**

- System to track and measure performance based on standardized performance metrics

[Aviva's Climate-Related Financial Disclosure 2019<sup>75</sup>](#)

[Aviva Climate Change Stocktake<sup>76</sup>](#)

[Our Climate-Related Financial Disclosure 2019<sup>77</sup>](#)

- Leadership review of monitoring and improvement results

[Aviva's Climate-Related Financial Disclosure 2019<sup>78</sup>](#)

[Aviva Climate Change Stocktake<sup>79</sup>](#)

## Robust Anti-Corruption Management Policies & Procedures

---

<sup>68</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>69</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>70</sup> <https://www.aviva.com/newsroom/news-releases/2020/11/aviva-opens-one-of-the-uks-largest-solar-initiatives/>

<sup>71</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/climate-related-financial-disclosure-2019-report.pdf>

<sup>72</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr\\_climate\\_change\\_and\\_environment\\_business\\_standard\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr_climate_change_and_environment_business_standard_2020.pdf)

<sup>73</sup> <https://www.aviva.com/social-purpose/operations/>

<sup>74</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/climate-related-financial-disclosure-2019-report.pdf>

<sup>75</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/climate-related-financial-disclosure-2019-report.pdf>

<sup>76</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/2018-aviva-climate-change-stocktake.PDF>

<sup>77</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/ara-our-climate-related-financial-disclosures.pdf>

<sup>78</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/climate-related-financial-disclosure-2019-report.pdf>

<sup>79</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/2018-aviva-climate-change-stocktake.PDF>



Please follow the links listed under each criterion to access further information available on aviva.com

**Criterion 12: The COP describes robust *commitments, strategies or policies* in the area of anti-corruption**

- Publicly stated formal policy of zero-tolerance of corruption  
[Aviva plc Strategic Report 2019](#)<sup>80</sup> (Page 20).

[The Aviva Business Ethics Code](#)<sup>81</sup>

- Commitment to comply with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes

[The Aviva Business Ethics Code](#)<sup>82</sup>

- Detailed policies for high-risk areas of corruption  
Our internal standards and procedures cover various areas of financial crime including bribery and corruption, money laundering, fraud and violations of applicable sanctions laws. Each Aviva market is required to designate specific persons responsible for financial crime prevention. Markets must undertake financial crime risk assessments, implement systems and controls to prevent, detect and report, consistent with applicable laws and regulations.

Our standards and procedures also provide for the monitoring of transactions, financial crime training, reporting suspicious activity, and management information to be collated and provided for the oversight of management. We have a robust set of ‘know your customer controls’ which apply not only to our potential customer, suppliers, employees but also potential business partners.

Political and charitable contributions are addressed in [The Aviva Business Ethics Code](#)<sup>83</sup>, Legal guidelines on political donations and expenditures, and the [CR Climate Change and Environment Business Standard](#)<sup>84</sup>

All Aviva businesses are required to understand the scope of local legal and regulatory requirements, allocate clear responsibilities for compliance and monitor this compliance on an ongoing basis.

**Criterion 13: The COP describes effective *management systems* to integrate the anti-corruption principle**

- Support by the organization’s leadership for anti-corruption  
[The Aviva Business Ethics Code](#)<sup>85</sup>

[Aviva plc Strategic Report 2019](#)<sup>86</sup> (Page 20).

---

<sup>80</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>81</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>82</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

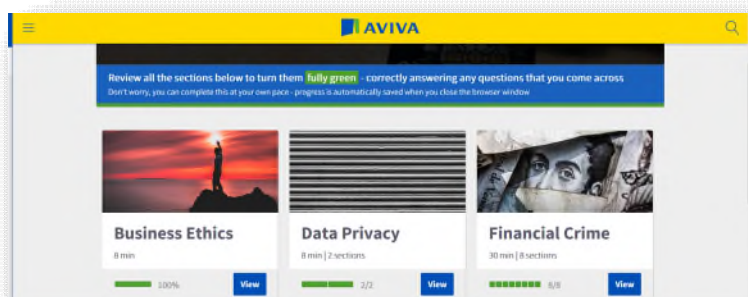
<sup>83</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>84</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/cr-climate-change-and-environment-business-standard-2020.pdf>

<sup>85</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>86</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

- Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees  
All Aviva employees are required to complete essential learning at least once a year. Training includes modules on financial crime (which includes bribery and corruption) and business ethics. See screenshot below.



- Management responsibility and accountability for implementation of the anti-corruption commitment or policy  
[Aviva plc Strategic Report 2019](#)<sup>87</sup> (Page 20).
- Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice  
[Policies and Responses](#)<sup>88</sup>  
See specifically:
  - [The Aviva Business Ethics Code](#)<sup>89</sup>
  - [Prevention of Bribery and Corruption Statement](#)<sup>90</sup>

As well as Speak Up, our confidential and independent reporting service, employees have free access to The Employee Assistance Programme by Care First. Care First provide a free and confidential service, offering professional, independent and impartial information, support and counselling. This includes online advice and support with issues, in and out of work as well as emotional support by phone 24/7.

**Criterion 14: The COP describes effective *monitoring and evaluation mechanisms* for the integration of anti-corruption**

- Due diligence procedures  
[Aviva plc Strategic Report 2019](#)<sup>91</sup> (Pages 21-22).
- Process to deal with incidents  
[Policies and Responses Prevention of Bribery and Corruption Statement](#)<sup>92</sup>  
[The Aviva Business Ethics Code](#)<sup>93</sup>

<sup>87</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>88</sup> <https://www.aviva.com/social-purpose/policies/>

<sup>89</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

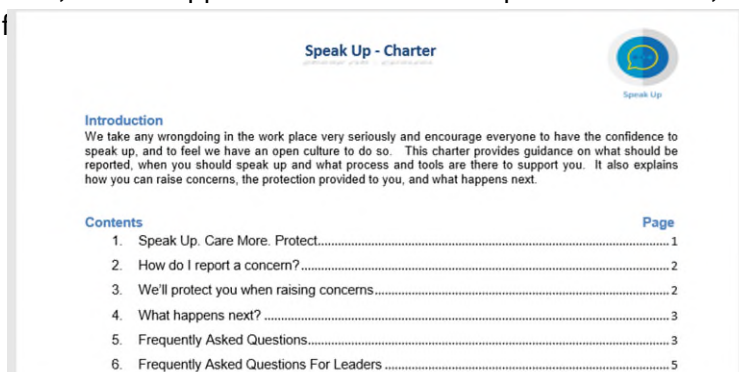
<sup>90</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Prevention-of-bribery-and-corruption-statement.pdf>

<sup>91</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>92</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Prevention-of-bribery-and-corruption-statement.pdf>

<sup>93</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

Our Speak Up charter, available internally, expands on the information available in [The Aviva Business Ethics Code](#).<sup>94</sup> It provides further details on what should be reported, as well as explaining the reporting process, what happens after someone reports a concern, etc. Please see the screenshot below



## Taking Action in Support of Broader UN Goals and Issues

Please follow the links listed under each criterion to access further information available on [aviva.com](#)

### Criterion 15: The COP describes core business contributions to *UN goals and issues*

- Align core business strategy with one or more relevant UN goals/issues  
[Sustainable Finance and the SDGs](#)<sup>95</sup>

[Aviva Foundation](#)<sup>96</sup>

[Environmental, Social and Governance Data 2019](#)<sup>97</sup>

- Develop relevant products and services or design business models that contribute to UN goals/issues

[Products and Services](#)<sup>98</sup>

[Responsible Investment](#)<sup>99</sup>

- Other emerging best practice:  
Supporting the creation of benchmarks for corporates in human rights and SDGs performance  
[World Benchmarking Alliance Launches](#)<sup>100</sup>

[The World Benchmarking Alliance](#)<sup>101</sup>

Working in partnership with other organisations, Aviva is supporting the development of a global benchmark on businesses sustainability performance, with a focus on the Sustainable Development Goals. The purpose of such benchmark is to provide stakeholders with

<sup>94</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>95</sup> <https://www.aviva.com/social-purpose/sustainable-finance-and-the-sdgs/>

<sup>96</sup> <https://www.aviva.com/social-purpose/aviva-foundation/>

<sup>97</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>98</sup> <https://www.aviva.com/social-purpose/products-and-services/>

<sup>99</sup> <https://www.aviva.com/social-purpose/responsible-investment/>

<sup>100</sup> <https://www.aviva.com/newsroom/news-releases/2018/09/world-benchmarking-alliance-launches/>

<sup>101</sup> <https://www.worldbenchmarkingalliance.org/>

information they can use to inform investment and other economic decisions, increase transparency and facilitate trust between sectors, help track and compare corporate sustainability performance, also identify strategic gaps and market opportunities, and ultimately catalyse action and accelerate SDG delivery.

#### [The Corporate Human Rights Benchmark \(CHRB\)<sup>102</sup>](#)

Aviva is a founder member and a major contributor. The CHRB is a first of its kind project that assesses and ranks listed companies on their human rights performance. It aims to drive better corporate human rights performance by harnessing the competitive nature of the market through public benchmarking of corporations and is chaired by Steve Waygood, chief responsible investment officer at Aviva Investors.

#### [Aviva Opens One of the UK's Largest Solar and Energy Storage Initiatives<sup>103</sup>](#)

### **Criterion 16: The COP describes strategic social investments and philanthropy**

- Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy

[Strengthening Communities Aviva Community Fund<sup>104</sup>](#)

[Corporate Responsibility Update 2019<sup>105</sup>](#)

- Coordinate efforts with other organisations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors

[Good Governance<sup>106</sup>](#)

[Sustainable Finance and The SDGs<sup>107</sup>](#)

[World Benchmarking Alliance<sup>108</sup>](#)

### **Criterion 17: The COP describes advocacy and public engagement**

- Publicly advocate the importance of action in relation to one or more UN goals/issues

[Sustainable Finance and the SDG<sup>109</sup>](#)

[Corporate Responsibility Update 2019<sup>110</sup>](#)

[A Marshall Plan to Save the Planet<sup>111</sup>](#)

- Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues

---

<sup>102</sup> <https://www.corporatebenchmark.org/>

<sup>103</sup> <https://www.aviva.com/newsroom/news-releases/2020/11/aviva-opens-one-of-the-uks-largest-solar-initiatives/>

<sup>104</sup> <https://www.aviva.com/social-purpose/our-stories/aviva-community-fund/>

<sup>105</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/corporate-responsibility-update-2019.pdf>

<sup>106</sup> <https://www.aviva.com/social-purpose/good-governance/>

<sup>107</sup> <https://www.aviva.com/social-purpose/sustainable-finance-and-the-sdgs/>

<sup>108</sup> <https://www.worldbenchmarkingalliance.org/>

<sup>109</sup> <https://www.aviva.com/social-purpose/sustainable-finance-and-the-sdgs/>

<sup>110</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/corporate-responsibility-update-2019.pdf>

<sup>111</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/marshall-plan-for-the-planet.pdf>

[Sustainable Finance and The SDGs<sup>112</sup>](#)

[Climate Risk and Environmental Impact<sup>113</sup>](#)

[Making Global Goals Local Business<sup>114</sup>](#)

**Criterion 18: The COP describes partnerships and collective action**

- Develop and implement partnership projects with public or private organisations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy
- Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company’s positive impact on its value chain

[Aviva Community Fund<sup>115</sup>](#)

[Climate Risk and Environmental Impact<sup>116</sup>](#)

[Aviva’s Modern Slavery Act Transparency Statement 2019<sup>117</sup>](#)

[Diversity and Inclusion<sup>118</sup>](#)

[Black Lives Matter Action Plan<sup>119</sup>](#)

Diversity and inclusion are key to Aviva being a responsible and successful business. In 2020, Aviva published a “Black Lives Matter” action plan to support our colleagues, educate our people and focus our wider impact in society. Our progress toward creating diversity is monitored and disclosed on an ongoing basis.

[Why Domestic Abuse is Everyone’s Business<sup>120</sup>](#)

Aviva is partnered with the charity Safe Lives to support our internal domestic abuse initiative. They helped us train over 150 members of staff to support both customers and colleagues being impacted by domestic abuse. A selection of our Vulnerable Customer Champions are now equipped to recognise the signs during customer calls and signpost appropriately. We also created a high-level course on our online learning platform which all colleagues in the UK and Ireland have access to.

## Corporate Sustainability Governance and Leadership

Please follow the links listed under each criterion to access further information available on aviva.com

**Criterion 19: The COP describes CEO commitment and leadership**

- CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN SDGs

---

<sup>112</sup> <https://www.aviva.com/social-purpose/sustainable-finance-and-the-sdgs/>

<sup>113</sup> <https://www.aviva.com/social-purpose/environment/>

<sup>114</sup> <https://www.unglobalcompact.org.uk/sustainable-development-goals-uk-roadshow/>

<sup>115</sup> <https://www.aviva.com/social-purpose/our-stories/aviva-community-fund/>

<sup>116</sup> <https://www.aviva.com/social-purpose/environment/>

<sup>117</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/aviva-modern-slavery-act-transparency-statement-2019.pdf>

<sup>118</sup> <https://www.aviva.com/about-us/diversity-and-inclusion/>

<sup>119</sup> <https://www.aviva.com/about-us/black-lives-matter-action-plan/>

<sup>120</sup> <https://www.aviva.com/newsroom/perspectives/2020/08/why-domestic-abuse-is-everyones-business/>

Please see our CEO letter and statement of continued support to the UN Global Compact and Sustainable Development Goals.

- CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards  
[Sustainable Finance and The SDGs](#)<sup>121</sup>

[Delivering Sustainable Finance](#)<sup>122</sup>

[Directors' and Corporate Governance Report](#)<sup>123</sup>

[Aviva plc Strategic Report 2019](#)<sup>124</sup> (Pages 4-6)

### **Criterion 20: The COP describes Board adoption and oversight**

- Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
- Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance  
[Customer, Conduct and Reputation Committee](#)<sup>125</sup>

[CR-Governance-Structure-2020 Nomination and Governance Committee](#)<sup>126</sup>

[Aviva plc Strategic Report 2019](#)<sup>127</sup> (Pages 21-23).

### **Criterion 21: The COP describes stakeholder engagement**

- Define sustainability strategies, goals and policies in consultation with key stakeholders
- Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'  
[Social Purpose- Bright Ideas](#)<sup>128</sup>

[The Aviva Business Ethics Code](#)<sup>129</sup> (Pages 7-9)

[Human Rights Policy](#)<sup>130</sup>

## **Women's Empowerment**

In 2019, women's empowerment continued to be a key part of our approach to inclusive diversity through our gender parity work.

---

<sup>121</sup> <https://www.aviva.com/social-purpose/sustainable-finance-and-the-sdgs/>

<sup>122</sup> <https://www.aviva.com/social-purpose/delivering-sustainable-finance/>

<sup>123</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/corporate-governance-report-aviva-plc-2019-annual-report-and-accounts.pdf>

<sup>124</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>125</sup> <https://www.aviva.com/about-us/customer-conduct-and-reputation-committee/>

<sup>126</sup> <https://www.aviva.com/about-us/nomination-and-governance-committee/>

<sup>127</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>128</sup> <https://www.aviva.com/social-purpose/bright-ideas/>

<sup>129</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>

<sup>130</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021\\_02-Human-Rights-Policy.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/2021_02-Human-Rights-Policy.pdf)

We seek to support women and men to achieve their potential regardless of their career level, market or role.

Aviva was the first FTSE 100 companies to sign up to the Executive Committee commitment outlined by the 30% Club - a commitment for 30% of our Group Executive to be women by 2020.

**The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the workplace**

- Achieving and maintaining gender equality in senior management and board positions
- Achieving and maintaining gender equality in middle management positions
- Equal pay for work of equal value
- Flexible work options
- Support for pregnant women and those returning from maternity leave
- Recruitment and retention, including training and development, of female employees
- Creating and maintaining workplace awareness of gender equality and, inclusion and non-discrimination for all workers
- Mentoring and sponsorship opportunities for women employees  
[Aviva plc Strategic Report 2019](#)<sup>131</sup> (Pages 17 and 55).

[Women in Finance Charter Aviva Commits to New 30% Club Target](#)<sup>132</sup>

[People Business Standard](#)<sup>133</sup>

[The Diversity Project Working at Aviva](#)<sup>134</sup>

[Accelerating Leadership from the Inside Out](#)<sup>135</sup>

[Aviva Women in Leadership Programme: Accelerating Leadership from the Inside Out](#)<sup>136</sup>

[UK Gender Pay Gap Report](#)<sup>137</sup>

[Nomination Committee Report](#)<sup>138</sup>

[Aviva Communities](#)<sup>139</sup>

We have guidance, policies and procedures available to all employees through our corporate intranet, which though not exclusively about gender, directly support women's empowerment and advance gender equality in the workplace. Some examples of these include: Fairness and equality

---

<sup>131</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>132</sup> <https://30percentclub.org/press-releases/view/aviva-commits-to-new-30-club-target>

<sup>133</sup> [https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/people\\_business\\_standard\\_2020.pdf](https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/policies-responses/people_business_standard_2020.pdf)

<sup>134</sup> <https://careers.aviva.co.uk/working-at-aviva/>

<sup>135</sup> <https://www.avivainvestors.com/en-gb/about/our-culture/women-in-leadership-programme/>

<sup>136</sup> <https://diversityproject.com/resource/aviva-women-leadership-programme-accelerating-leadership-inside-out>

<sup>137</sup> <https://www.aviva.com/about-us/uk-gender-pay-gap-report/>

<sup>138</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/about-us/nomination-committee-report-aviva-plc-2019-annual-report-and-accounts.pdf>

<sup>139</sup> <https://www.aviva.com/about-us/aviva-communities/>

at the workplace policy, and guidelines on managing: gender in the workplace, pregnancy and maternity in the workplace, marriage and civil partnership in the workplace.

We also have an employee assistance service that provides support dealing with a wide range of issues and every year employees are required to complete an essential learning course that includes a diversity module.

In 2018, we established six global employee resource groups, which we're calling "Aviva Communities." Our Communities are one of the ways we're working together to become more diverse and inclusive. They help make sure everyone can have a fair share of voice at Aviva and they are a key feature in representing the diversity of our global workforce. Any of our people can join as many of our Communities as they like. These groups are a safe space for our employees to share their thoughts and experiences. One of these communities, Aviva Balance, focuses on gender parity by seeking to support women and men to achieve their potential regardless of their career level, market or role. This community has three Group Executives as sponsors.

**The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the marketplace**

- Asking suppliers to sign up to our business code of behaviour which contains requirements on access to equal opportunities  
[The Aviva Business Ethics Code 2020<sup>140</sup>](#)

[Environmental, Social and Governance Data 2019<sup>141</sup>](#)

**The COP describes policies and practices related to supporting women's empowerment and advancing gender equality in the community**

- Designing community stakeholder engagements that are free of gender discrimination/stereotyping and sensitive to gender issues
- Ensuring female beneficiaries of community programmes
- Community initiatives specifically targeted at the empowerment of women and girls  
[Women of the Future Award<sup>142</sup>](#)

[Women of the Future Award- 6 Year Commitment<sup>143</sup>](#) (Page 6)

[Aviva Community Fund- A New Decade<sup>144</sup>](#)

The Community Fund provides access to a range of projects, including those focused on women's empowerment

---

<sup>140</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/socialpurpose/pdfs/Aviva-Business-Ethics-Code-2020.pdf>









<sup>141</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>142</sup> <https://awards.womenofthefuture.co.uk/>

<sup>143</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/about-us/uk-gender-gap-report-2020.pdf>

<sup>144</sup> <https://www.aviva.co.uk/services/more-from-aviva/aviva-community-fund/>



|  |  |  |  |
|--|--|--|--|
|  <p><b>Staying Connected support and information</b><br/>To expand our programme of online, postal and phone support for anyone affected by ovarian cancer during the</p> <p>87% raised      16 days left</p> |  <p><b>UK FASHION RECOVERY</b><br/>Pay trainers, Purchasing sewing machines/laptops/licenses, and employing a part-time quality administrator to oversee online</p> <p>84% raised      16 days left</p> |  <p><b>Fresh Start, Supporting Homeless Women to Move On</b><br/>To fund supportive work with women in a refuge following negative experiences such as Domestic</p> <p>53% raised      41 days left</p> |  <p><b>Keeping Asylum Seekers Connected WIFI Project</b><br/>Wifi for asylum seekers in Plymouth NASS (National Asylum Support Services) accommodations.</p> <p>43% raised      41 days left</p>             |
|  <p><b>4Wings Zumba Classes (Zumba en Familia)</b><br/>To deliver ZUMBA sessions in a bid reach out, engage &amp; improve overall health of people in our community</p> <p>41% raised      16 days left</p>   |  <p><b>Women's Economic Empowerment Project</b><br/>Training and supporting BME women to develop skills to move towards employment and being work-ready.</p> <p>19% raised      41 days left</p>        |  <p><b>Money Management Futures</b><br/>Aim for this project: is to improve the financial well-being of women from BAME and low-socioeconomic backgrounds.</p> <p>0% raised      16 days left</p>       |  <p><b>Stamp Out Drink Spiking Across the South West</b><br/>Drink spiking is unacceptable. Rape, robbery and even death are reported outcomes. We want to stamp out</p> <p>55% raised      41 days left</p> |

### The COP contains or refers to sex-disaggregated data

- Achieving and maintaining gender equality in senior management and board positions
- Achieving and maintaining gender equality in middle management positions (Page 6) [Aviva plc Strategic Report 2019<sup>145</sup>](#) (Page 17).

[Environmental, Social and Governance Data 2019<sup>146</sup>](#)

[UK Gender Pay Gap Report<sup>147</sup>](#)

<sup>145</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/aviva-plc-strategic-report-2019.pdf>

<sup>146</sup> <https://www.aviva.com/content/dam/aviva-corporate/documents/investors/pdfs/reports/2019/environmental-social-and-governance-data-2019-and-assurance-statement.pdf>

<sup>147</sup> <https://www.aviva.com/about-us/uk-gender-pay-gap-report/>